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6	Attorneys for Plaintiff			
7	United States of America			
8	IN THE UNITED STATES DISTRICT COURT			
9	EASTERN DISTRICT OF CALIFORNIA			
10	LASTERN DIST.	MCT OF CALIFORNIA		
11	UNITED STATES OF AMERICA,	CASE NO. 2:24-MJ-00141 AC		
12	Plaintiff,	STIPULATION FOR EXTENSION OF TIME FOR PRELIMINARY HEARING PURSUANT TO RULE		
13	v.	5.1(d) AND EXCLUSION OF TIME		
14	LEONARDO YANEZ ZAMBRANO,	DATE: November 27, 2024		
15	OMAR QUINTERO ALVARADO,	TIME: 2:00 p.m. COURT: Hon. Jeremy D. Peterson		
16	Defendants.			
17				
18	Plaintiff United States of America, by and through its attorney of record, Special Assistant			
19	United States Attorney MATTHEW DE MOURA, and defendants LEONARDO YANEZ ZAMBRANO			
20	and OMAR QUINTERO ALVARADO. both inc	lividually and by and through their counsel of record,		
21	CHRISTOPHER COSTA and TASHA CHALFA	ANT, hereby stipulate as follows:		
22	1. The Complaint in this case was filed on November 7, 2024, and defendant first appeared			
23	before a judicial officer of the Court in which the charges in this case were pending on November 13,			
24	2024. The court set a preliminary hearing date of November 27, 2024.			
25	2. By this stipulation, the parties jointly move for an extension of time of the preliminary			
26	hearing date to December 18, 2024, at 2:00 p.m., before the duty Magistrate Judge, pursuant to Rule			
27	5.1(d) of the Federal Rules of Criminal Procedure. The parties stipulate that the delay is required to			
28	allow the defense reasonable time for preparation, and for the government's continuing investigation of			

STIPULATION 1

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1	the case. The parties further agree that the interests of justice served by granting this continuance		
2	outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A		
3	3. The parties agree that good cause e	exists for the extension of time, and that the extension	
4	of time would not adversely affect the public interest in the prompt disposition of criminal cases.		
5	Therefore, the parties request that the time between November 27, 2024, and December 18, 2024, be		
6	excluded pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4.		
7	IT IS SO STIPULATED.		
8			
9	Dated: November 22, 2024	PHILLIP A. TALBERT United States Attorney	
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11		/s/ MATTHEW DE MOURA MATTHEW DE MOURA	
12		Special Assistant United States Attorney	
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14	Dated: November 22, 2024	/s/ CHRISTOPHER COSCA	
15		CHRISTOPHER COSCA Counsel for Defendant	
16		LEONARDO YANEZ	
17		ZAMBRANO	
18	Dated: November 22, 2024	/s/ TASHA CHALFANT	
19		TASHA CHALFANT Counsel for Defendant	
20		OMAR QUINTERO ALVARADO	
21		ALVARADO	
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STIPULATION 2

1 2 3 4 5 6 7	PHILLIP A. TALBERT United States Attorney MATTHEW DE MOURA Special Assistant United States Attorney 501 I Street, Suite 10-100 Sacramento, CA 95814 Telephone: (916) 554-2700 Facsimile: (916) 554-2900 Attorneys for Plaintiff United States of America		
8 9 10	IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA		
11	UNITED STATES OF AMERICA,	CASE NO. 2:24-MJ-00141 AC	
12	Plaintiff,	[MODIFIED] FINDINGS AND ORDER EXTENDING TIME FOR PRELIMINARY	
13	v.	HEARING PURSUANT TO RULE 5.1(d) AND EXCLUDING TIME	
14	LEONARDO YANEZ ZAMBRANO,	DATE: November 27, 2024	
15	OMAR QUINTERO ALVARADO,	TIME: 2:00 p.m. COURT: Jeremy D. Peterson	
16	Defendants.	COOKI. Selemy B. Teleison	
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18	The Count has need and considered the St	invlation for Extension of Time for Dualingings, Hoosing	
19		ipulation for Extension of Time for Preliminary Hearing	
20	Pursuant to Rule 5.1(d) and Exclusion of Time, filed by the parties in this matter on November 22, 2024.		
21 22	The Court hereby finds that the Stipulation, which this Court incorporates by reference into this Order,		
23	demonstrates good cause for an extension of time for the preliminary hearing date pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure.		
24	Furthermore, for the reasons set forth in the parties' stipulation, the Court finds that the interests		
25	of justice served by granting this continuance outweigh the best interests of the public and the defendant		
26	in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The Court further finds that the extension of time would		
27	not adversely affect the public interest in the prompt disposition of criminal cases.		
28	THEREFORE, FOR GOOD CAUSE SH	OWN:	

1	1. The date of the preliminary hearing is extended to December 18, 2024, at 2:00 p.m.	
2	2. The time between November 27, 2024, and December 18, 2024, shall be excluded from	
3	calculation pursuant to 18 U.S.C. § 3161(h)(7)(A) and § 3161(h)(7)(B)(iv), Local Code T-4.	
4	3. Defendants shall appear at that date and time before the Magistrate Judge on duty.	
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6	IT IS SO ORDERED.	
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8	Dated: November 22, 2024	
9	CHI SOO KIM	
10	UNITED STATES MAGISTRATE JUDGE	
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